

1 JOINTLY SUBMITTED

2 **IN THE UNITED STATES DISTRICT COURT**

3 **DISTRICT OF NEVADA**

4 William Bridge, *on behalf of himself and all*
5 *others similarly situated,*

6 Plaintiff,

7 vs.

8 Credit One Financial, a Nevada Corporation
9 d/b/a Credit One Bank, N.A.,

10 Defendant.

Case No.: 2:14-cv-01512-LDG-NJK

**STIPULATION AND [PROPOSED] ORDER
EXTENDING TIME TO RESPOND TO
MOTION TO STAY ACTION PURSUANT
TO PRIMARY JURISDICTION
DOCTRINE**

(Second Request)

11
12 The parties to the above-captioned action hereby jointly submit for the Court's approval the
13 following Stipulation and Proposed Order:

14 WHEREAS, on February 2, 2015, Defendant CREDIT ONE FINANCIAL d/b/a CREDIT
15 ONE BANK, N.A. ("Defendant") filed a Motion to Stay Action Pursuant to the Primary
16 Jurisdiction Doctrine Pending Outcome of Petitions Currently Before the Federal Communications
17 Commission ("Motion") (Dkt. No. 27);

18 WHEREAS, Plaintiff WILLIAM BRIDGE ("Plaintiff") has previously requested, on
19 February 13, 2015, by stipulation with Defendant (Dkt. No. 34), a one-week extension of time in
20 which to respond to the Motion, which was denied without prejudice on February 17, 2015 (Dkt.
21 No. 36), and has received no extension of such time as of the date of this filing;

22 WHEREAS, Plaintiff requires additional time to respond to Defendant's Motion because (a)
23 Plaintiff is currently investigating and confirming facts believed by Plaintiff to bear materially on
24 Defendant's arguments in support of the Motion, which investigation and confirmation is not
25 expected to be completed prior to February 20, 2015; (b) Plaintiff is still reviewing and analyzing
26 the numerous petitions pending before the Federal Communications Commission filed by
27 Defendant in support of the Motion, and does not expect such review and analysis to be completed
28 prior to February 20, 2015; and (c) Plaintiff requires at least two business days to draft the results of

Plaintiff's factual investigation described in sub-paragraph (a), above, and the results of Plaintiff's legal analysis described in sub-paragraph (b), above, making February 24, 2015, a reasonable and appropriate deadline for responding to the Motion;

WHEREAS, under the present schedule, Plaintiff's response to the Motion is due on February 17, 2015;

WHEREAS, Plaintiff and Defendant have conferred and agreed that the time for Plaintiff's response to the Motion should be extended by a period of seven (7) days;

NOW, THEREFORE, the parties, by and through their respective undersigned counsel, and subject to this Court's approval, agree and stipulate that Plaintiff may file a response to the Motion no later than February 24, 2015.

IT IS SO STIPULATED:

SHOOK & STONE, CHTD.

GRANT & EISENHOFER P.A.

/s/ Leonard H. Stone
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IT IS SO ORDERED:

NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE

DATED: _____